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July 3, 2024

By ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn NY 11201

Re: *United States v. Zhu*, 21 Cr. 265 (PKC)

Your Honor:

I write with Pretrial Services' and the government's consent respectfully to request that the bond for my client, Zhu Yong, be amended to allow him to travel to medical appointments outside of curfew hours. Mr. Zhu has a curfew with hours set by the court – he can leave home daily between 9:00 am and 9:00 pm. *See* April 1, 2022 Order (between docket entries 132 and 133 on the docket sheet). He was in a car crash and needs to have a scan and other assessments done, and a medical vehicle is scheduled to pick him up at his home at 5:00 am on July 5. However, because his curfew hours are set by court order, I understand from Pretrial Services that he requires a court order to travel outside of those hours.

For the foregoing reasons, I respectfully request that the Court modify Mr. Zhu's bond to permit Pretrial Services to amend his curfew times as necessary for medical appointments, both on July 5 and on an ongoing basis. I spoke with AUSA Craig Heeren and Pretrial Services Officer Chijoke Ezenyilimba, and they both consent to this request. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman
Attorney for Yong Zhu

cc: Counsel of record (by ECF)
Pretrial Officer Chijoke Ezenyilimba (by email)